

North Carolina
Department of Environment and Natural Resources

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director



October 19, 2006

NAVFAC Atlantic
Attn: Daniel R Hood
Code: OPCEV
NC/Caribbean IPT, EV Business Line
6506 Hampton Blvd
Norfolk, VA 23508-1273

RE: Comments on the Draft Amended Remedial Investigation
Operable Unit (OU) # 21, Site 73 MCB Camp Lejeune, NC
Camp Lejeune, NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Hood:

The NC Superfund Section has received and reviewed the OU #21 (Site 73) Draft Amended Remedial Investigation dated October 2006, for the Camp Lejeune, MCB Superfund Site located in Jacksonville, NC. The following comments are offered for the Partnering Teams consideration. The Aquifer Protection Section of DWQ, Wilmington Regional Office has also provided comments and they are included this letter.

1. The last paragraph on page 5-1 indicates that soil action levels are established through the 2L rules. 2L does not address soil contamination levels. Soil cleanup is addressed in the Guidelines.
2. In Section 5.2.2 the report states "The extent of the vinyl chloride plume is impossible to interpret, based on the fact that the detection limit is greater than the NCGWQS of 0.015 ug/L. 2L states "Where the standard for a substance is less than the practical quantitation limit (PQL), the detection of that substance at or above the PQL shall constitute a violation of the standard." This has been interpreted to mean that the PQL serves as the standard in these instances. The vinyl chloride plume can be interpreted using the PQL as the standard.

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Mr. Daniel Hood

9-07-2006

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If you have any questions or comments, please contact me, at (919) 508 8489 or email to beth.hartzell@ncmail.net

Sincerely,



Elizabeth A. Hartzell
Environmental Engineer
NC Superfund Section

Cc: Dave Lown, NC Superfund Section
Bob Lowder, EMD/IR
Gena Townsend, USEPA